

**SUSAN C VINEYARD**  
301 East Oak Street  
West Frankfort, Illinois 62896  
618-932-3222 telephone  
svcollect@aol.com

ILLINOIS  
COMMERCE COMMISSION *mm*

2004 OCT 25 A 8:49

CHIEF CLERK'S OFFICE

SUSAN VINEYARD

Complainant,

Docket # 04-0094

Vs

CENTRAL ILLINOIS PUBLIC SERVICE  
COMPANY, dba AmerenCIPS,

Respondent.

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### **CLOSING STATEMENT .**

NOW COMES Complainant SUSAN VINEYARD, and makes this CLOSING STATEMENT to the Court in support of direct testimony and oral testimony of ROBIN HADLEY, supervisor of credit and collections for AmerenCIPS as follows:

#### **ILLINOIS ADMINISTRATIVE CODE 280.50 c**

1. AmerenCIPS is in violation of Illinois Administrative Code 280.50 c which provides that *A bill for one class of service (residential or non-residential) shall not be transferred to a bill for the other class of service.....*
  - a.) VINEYARD testified that 703 East Oak # D, West Frankfort is non-residential service and gave extensive testimony that described the true nature and use of these premises, notwithstanding that AmerenCIPS had mis-classified the type of service as residential.
  - b.) HADLEY, who was unfamiliar with the said property, could not establish that the residential rating was incorrect.
  - c.) HADLEY mis-led the Court by stating that unit D had always been residential, which is totally inaccurate as there had been no unit D prior to Mr. Shokohi's purchase of the property, when he established the account with AmerenCIPS for a house meter for porch light service.

- d.) Even if it were true that unit D had always been rated as residential, that does not excuse AmerenCIPS for the present mis-classification.
- e.) 703 East Oak Street is a three unit apartment complex and the residential units are referred to as 703 East Oak # A, B and C individually and the tenant pays for its own utility.
- f.) AmerenCIPS installed a meter for electric service, that is used on the front porch and back porch as a house meter for common area use at 703 East Oak and it is referred to as 703 East Oak Street # D for billing purposes.
- g.) VINEYARD has never owned the real property at 703 East Oak.
- h.) VINEYARD has never applied for energy service at 703 East Oak Street.
- i.) VINEYARD has never allowed anyone to use her social security number for obtaining energy service at this address or any other address.
- j.) It is impossible for VINEYARD or any other third party to live at 703 East Oak Street # D as there is no residential unit at that location.

**ILLINOIS ADMINISTRATIVE CODE 280.50 d**

2. AmerenCIPS is in violation of Illinois Administrative Code 280.50 d which provides that *If a utility takes application for service by telephone from third parties or users who will not be the customers of the service, and if the utility does not verify the third party or user application with the customer, the utility shall not be entitled to collect from the customer of the service if the customer disclaims any responsibility for requesting the service; provided, however, that users will be responsible for paying for their use.*

- a. Ms. Hadley testified that it is the company practice of AmerenCIPS to accept an application from an individual, that places a telephone call to the AmerenCIPS call center, with a social security number that does not have an outstanding account with AmerenCIPS with that same social security number and no identification is required, unless AmerenCIPS suspects fraud.
- b. AmerenCIPS had full knowledge of the social security number of Susan Vineyard.
- c. AmerenCIPS knew, or should have known, that the social security number used by other individuals or entities belonged to someone else, but took no measure to require accurate identification from the energy requesting parties.
- d. AmerenCIPS did not verify any user application with VINEYARD.
- e. VINEYARD denies any responsibility for the following accounts:
  - 1.) Catherine S Vineyard in the amount of \$ 999.36.
  - 2.) Toscano Land Trust in the amount of \$ 1076.10.
  - 3.) Sangiovese Land Trust in the amount of \$ 1181.66.
  - 4.) Christine Susan Vineyard in the amount of \$ 383.35.
- f. VINEYARD, has accepted responsibility for energy services at 301 East Oak Street, in the name of Catherine S Vineyard, for services from May 15, 2002 to present in the amount of \$ 662.00, plus the service of SUSAN VINEYARD from September 17, 2003 to present.
- g. Although application for energy services at 301 East Oak Street was made by VINEYARD on or about May 15, 2002, services were not placed in VINEYARD's name until on or about September 20, 2003, notwithstanding that AmerenCIPS had produced a worksheet used at the time of

VINEYARD'S application, that was clearly marked approved.

- h. Any and all wrongful late charges, fees and assessments made against the account of SUSAN VINEYARD from September 20, 2003 are not accepted by VINEYARD.

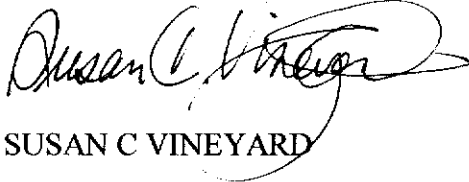
### **SUMMARY**

1. AmerenCIPS has violated the Illinois Administrative Code 280.50 c by failure to properly classify the service at 703 East Oak Street # D and its attempt to transfer non-residential service to SUSAN VINEYARD's residential service at 301 East Oak Street.
2. Illinois Administrative Code 280.50 d, prevents AmerenCIPS from transferring accounts from individuals and entities that have fraudulently used the social security number of SUSAN VINEYARD to obtain energy services, to the current account of SUSAN VINEYARD.
3. AmerenCIPS's company policy, is in breach of the Illinois Administrative Code 280.50 d and is an attempt to penalize SUSAN VINEYARD for their failure to follow the law and to absorb their losses.
4. AmerenCIPS has made serious errors in the extension of credit and billing procedures, and, therefore, has breached Illinois Administrative Code 280.50d , and attempts to require VINEYARD to make good for their errors and improper company policy.
5. VINEYARD gave accurate proof of identification with the submission of California Driver's License and United States passport on May 15, 2002 and September 17, 2003 and AmerenCIPS did not raise any issue as to their authenticity or genuineous.
6. However, AmerenCIPS issued an extension of credit to four entities or individuals without any credentials, and tries to slip their inadequacies

and lack of sound company policy and poor decision making under  
VINEYARD'S rug. Not Right.

I declare, under the penalty of perjury of the State of Illinois, that all  
statements made herein are true, accurate and honest, and I can testify if  
called as a witness in this matter.

RESPECTFULLY SUBMITTED:



SUSAN C VINEYARD

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